

LANE REGIONAL AIR PROTECTION AGENCY

1010 Main Street, Springfield, Oregon 97477

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AIR CONTAMINANT DISCHARGE PERMIT (ACDP)

Issued in accordance with provisions of Title 34, Lane Regional Air Protection Agency's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued To:

Seneca Sawmill Company

90201 Highway 99N

Eugene, Oregon 97402

Land Use Compatibility Statement:

From: City of Eugene

Date: January 22, 2001

Mailing Address:

P.O. Box 851

Eugene, Oregon 97440

Fee Basis:

Table A, Part II

10a, Sawmill/Planing Mill

58c, Fuel Burning Equipment

>10 and < 100 million BTU/hr

Permit Number: 207459

Permit Type: Regular

SIC: 2421 Sawmill/Planing Mill

4961 Fuel Burning Equipment

Date Renewed: January 26, 2006

Expiration Date: January 25, 2011

Specific Emission Units:

Various Sawmill Activities

2 Dry Kilns

2 Natural Gas-fired Boilers

(100 Hp and 400 Hp), both with No.2 oil

backup. 400Hp boiler is subject to NSPS

Subpart Dc

Issued

By: _____

Merlyn L. Hough, Director

Effective

Date: _____

Permitted Activities

1. Until this permit expires or is revoked, the permittee is herewith allowed to discharge air contaminants only in accordance with the permit application and the requirements, limitations, and conditions contained in this permit. This specific listing of requirements, limitations, and conditions does not relieve the permittee from complying with all other rules of Lane Regional Air Protection Agency (LRAPA).

Emission Unit Description

2. The emission units regulated by this permit are the following:

Emission Unit	Control Equipment
Sawmill/planning mill activities	Cyclones and Baghouses
2 Dry Kilns	None
One (1) 400 Hp Natural Gas-fired boiler, with No.2 Oil backup and subject to Subpart Dc	None
One (1) 200 Hp Natural Gas-fired boiler, with No.2 Oil backup	None

Performance Standards and Limitations

Plant Site Emission Limits (PSELs)

3. Emissions from the sawmill operation, boilers and dry kilns shall not exceed the following 12-month rolling limits. Any changes in operation that might increase emissions above the following PSELs must be approved by LRAPA. Failure to do so may result in enforcement action.

Annual (12-month rolling) PSELs
 (tons/year)

Source	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Totals	49	27	53	48	99	57

General Emission Limitations

4. The permittee shall not cause, suffer, allow, or permit the emission of any air contaminant, excluding uncombined water, into the atmosphere from any air contaminant source for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal or greater than 20 percent opacity. [LRAPA 32-010-1B and 3]
5. Particulate emissions shall not exceed 0.2 grains per dry standard cubic foot (dscf) from any air contaminant source constructed or modified prior to June 1, 1970. [LRAPA 32-015-1]
6. To ensure that HAP emissions from the dry kilns remain at the lowest extent possible, the permittee shall limit the maximum temperature in each kiln to no more than 200 degrees Fahrenheit (200 F). [LRAPA 32-007]
7. The facility-wide emissions of hazardous air pollutants (HAPs) shall not exceed 10 tons/yr for any single HAP or 25 tons/yr for total HAPs.

Boilers

8. The maximum allowable emission of particulate matter from each boiler shall not exceed 0.1 grains per cubic foot of exhaust gas, adjusted to 50 percent excess air or calculated to 12 percent carbon dioxide. [LRAPA 32-030]
9. The 400 Hp natural gas- or diesel-fired boiler shall comply with the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60, Subparts A and Dc), including, but not limited to, monthly record keeping of fuel usage and semi-annual reporting. [LRAPA 46-554]
10. The sulfur content in the No.2 fuel oil shall not exceed 0.5%. [LRAPA 32-065 (2)(B)]

Monitoring, Recordkeeping and Reporting Requirements

11. A record of the following data shall be maintained at the plant site for a period of two (2) years following date of entry and shall be available for inspection by authorized representatives of LRAPA. All totals except for item j shall be 12-month rolling totals: [LRAPA 34-070-5]

<u>Parameter</u>	<u>Minimum Recording Frequency</u>
a. Stud Mill lumber production	Monthly
b. Mill A lumber production	Monthly
c. Dry Kiln Throughput	Monthly
d. Chips from sawmills shipped	Monthly
e. Chips shipped by rail	Monthly
f. Sawdust shipped	Monthly

- g. Shavings shipped Monthly
- h. Natural Gas Combusted Monthly
- i. No. 2 Fuel Oil Combusted Monthly
- j. Certification of sulfur content of No.2 fuel oil Each delivery
- k. Dry kiln temperature Twice per charge

12. Compliance with the PSEL is determined for each 12-month rolling period based on the following calculation for each pollutant for all processes:

$$E = \Sigma(EF \times F)/2000$$

where,

- E = pollutant emissions (tons/year);
- EF = pollutant emission factor (see Condition 13);
- F = fuel combustion or material throughput (see Condition 11;)

13. The permittee must use the default emission factors provided in Attachment B for calculating pollutant emissions, unless alternative emission factors are approved by LRAPA. The permittee may request or LRAPA may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by LRAPA.
14. In addition to the PSEL monitoring calculations required by Condition 12 and to ensure compliance with the HAPs limits in Condition 7, the permittee shall limit lumber production and by-product throughput to the following 12-month rolling totals:
- a. Stud Mill throughput of 288,225 MBF
 - b. Mill A lumber production of 411,750 MBF.
 - c. Chips from Saw Mills throughput total of 176883 BDT.
 - d. Chips Shipped by Rail total of 88,445 BDT.
 - e. Total Sawdust of 77,939.
 - f. Total Lumber Dried of 90,886 MBF.
 - g. No. 2 Diesel Fuel combustion of 1.5 million gallons.
 - h. Natural Gas combustion of 210 million cubic feet.

Reporting

15. **The permittee shall submit to LRAPA by January 30th of each year** this permit is in effect, the following information for the preceding calendar year:
- a. The excess emission log information required per Condition G.13, if required by Condition G.13.
 - b. Annual emissions as calculated according to Condition 12, including the supporting process parameter and emission factor information.
 - c. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
 - d. List major maintenance performed on pollution control equipment.
 - e. Records of all fuels combusted by the 400 Hp boiler during each semi-annual calendar period. [40 CFR 60.48c]

16. If any distillate fuel oil is combusted during each calendar semi-annual period, ***the permittee shall submit to LRAPA by January 30th and July 30th of each year*** this permit is effect, the following information of the preceding semi-annual period [40 CFR 60.48c (j)]:
- a. Records of all fuels combusted by the 400 Hp boiler during each semi-annual calendar period.
17. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions shall be reported to the following office: [LRAPA 34-070 (5)]

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477
(541) 736-1056

Open Burning

18. Open burning is prohibited in accordance with the requirements of LRAPA 47-020.

Fee Schedule

19. In accordance with adopted regulations, the permittee will be invoiced once every year for the Compliance Determination Fee. [LRAPA 34-150]

Max/cmw
01/30/08

GENERAL PERMIT CONDITIONS

General Conditions and Disclaimers

- G1. A copy of the permit application and this Air Contaminant Discharge Permit (ACDP) must be available on site for inspection upon request.
- G2. The permittee shall allow the Director or his/her authorized representatives access to the plant site and pertinent records at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant discharge records and otherwise conducting necessary functions related to this permit in accordance with ORS 468.095. [LRAPA 13-020(1)(h)]
- G3. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

Performance Standards and Emission Limits

- G4. The permittee shall not cause or permit the emissions of any particulate matter which is greater than 250 microns in size if such particulate matter does or will deposit upon the real property of another person. [LRAPA 32-055]
- G5. The permittee shall not discharge from any source whatsoever such quantities of air contamination which cause injury, detriment, public nuisance or annoyance to any persons or to the public or which cause injury or damage to business or property; such determination to be made by LRAPA. [LRAPA 32-090(1)]
- G6. The permittee shall not cause or permit emission of water vapor if the water vapor causes or tends to cause detriment to the health, safety or welfare of any person or causes, or tends to cause damage to property or business. [LRAPA 32-090(2)]
- G7. The permittee shall not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals emissions of air contaminants which would otherwise violate LRAPA rules. [LRAPA 33-030(1)]
- G8. The permittee shall not cause or permit the installation or use of any device or use of any means designed to mask the emissions of an air contaminant which causes or tends to cause detriment to health, safety or welfare of any person. [LRAPA 33-030(2)]
- G9. The permittee shall not allow any materials to be handled, transported, or stored; or a building, its appurtenances or road(s) to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from being airborne. [LRAPA 48-015(2)]
- G10. The permittee shall not cause or permit the emissions of odorous matter in such a manner as to cause a public nuisance. [LRAPA 49-010(1)]

Excess Emissions: General Policy

- G11. Emissions of air contaminants in excess of applicable standards or permit conditions are considered unauthorized and are subject to enforcement action, pursuant to LRAPA 36-010 and 36-030. These rules apply to any permittee operating a source which emits air contaminants in

violation of any applicable air quality rule or permit condition resulting from the breakdown of air pollution control equipment or operating equipment, process upset, startup, shutdown, or scheduled maintenance. [LRAPA 32-001(1)]

Excess Emissions: Notification and Record-keeping

- G12. The permittee must immediately (i.e., as soon as possible, but in no case more than one (1) hour after the beginning of the excess emissions period) notify LRAPA by telephone or in person of all cases of excess emissions due to upset or breakdown. [LRAPA 36-020(1)] Notification shall include:
- a. source name;
 - b. nature of the emissions problem;
 - c. name of the person making the report;
 - d. name and telephone number of the contact person for further information;
 - e. date and time of the onset of the upset condition;
 - f. whether or not the incident was planned;
 - g. equipment involved in the upset or breakdown;
 - h. estimated type and quantity of excess emissions;
 - i. estimated time of return to normal operations;
 - j. efforts made to minimize emissions; and
 - k. description of remedial actions to be taken.

Notification shall be made to the LRAPA office. The current LRAPA telephone number during regular business hours (8 a.m. - 5 p.m., M-F) is (541) 736-1056. During nonbusiness hours, weekends, or holidays, the permittee shall immediately notify LRAPA by calling the LRAPA Upset/Complaint Line. The current number is (541) 726-1930.

Follow-up reporting, if required by LRAPA, shall contain all information required by Condition G15.

- G13. At each reporting period specified in this permit, or sooner if required by LRAPA, the permittee shall submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025(4)]
- G14. Any excess emissions which could endanger public health or safety shall immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.
- G15. The permittee shall keep an upset log of all planned and unplanned excess emissions. [LRAPA 36-025(3) and 36-030(1)] The upset log shall include the following:
- a. date and time each event was reported to LRAPA;
 - b. whether the process handling equipment and the air pollution control equipment were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
 - c. whether repairs or corrections were made in an expeditious manner when the permittee knew or should have known that emission limits were being or were likely to be exceeded;
 - d. whether the event was one in a recurring pattern of incidents which indicate inadequate design, operation, or maintenance; and
 - e. final resolution of the cause of the excess emissions.

Upset logs shall be kept by the permittee for two (2) calendar years.
[LRAPA 36-025(4)]

Excess Emissions: Scheduled Maintenance

- G16. Where it is anticipated that shutdown, by-pass, or operation at reduced efficiency of production equipment or air pollution control equipment for necessary scheduled maintenance may result in excess emissions, the permittee must obtain prior LRAPA approval of procedures that will be used to minimize excess emissions. Application for approval of procedures associated with the scheduled maintenance shall be submitted and received by LRAPA in writing at least seventy-two (72) hours prior to the event. [LRAPA 36-015(1)] The application shall include the following:
- a. reasons explaining the need for maintenance, including why it would be impractical to shut down the source operation during the period, and why the by-pass or reduced efficiency could not be avoided through better scheduling for maintenance or through better operation and maintenance practices;
 - b. identification of the specific production or emission control equipment or system to be maintained;
 - c. nature of the air contaminants likely to be emitted during the maintenance period, and the estimated amount and duration of the excess emissions, including measures such as the use of overtime labor and contract services and equipment that will be taken to minimize the length of the maintenance period; and
 - d. identification of specific procedures to be followed which will minimize excess emissions.
- G17. No scheduled maintenance which is likely to result in excess emissions shall occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced "Stage I Red" woodstove advisory period, in areas determined by LRAPA as PM₁₀ Nonattainment Areas. [LRAPA 36-015(4)]
- G18. In cases where LRAPA has not received notification of scheduled maintenance that is likely to cause excess emissions within the required seventy-two (72) hours prior to the event, or where such approval has not been waived pursuant to LRAPA 36-025(2), the permittee shall immediately notify LRAPA by telephone of the situation, and shall be subject to the requirements of Conditions G12 and G13. [LRAPA 36-015(5)]

Air Pollution Emergencies

- G19. The permittee shall, upon declaration of an air pollution episode, take all actions specified in Tables 1, 2, and 3 of LRAPA's Title 51 (see Attachment A) and shall particularly put into effect the LRAPA-approved preplanned abatement strategy for such condition, if applicable. [LRAPA 51-015]

Notification of Construction/Modification

- G20. The permittee shall notify LRAPA in writing and obtain approval in accordance with LRAPA 34-035 before:
- a. constructing or installing any new source of air contaminant emissions, including air pollution control equipment; or
 - b. modifying or altering an existing source that may significantly affect the emissions of air contaminants, or

- c. making any physical change which increases emissions; or
- d. changing the method of operation, the process, or the fuel use, or increasing the normal hours of operation to levels above those contained in the permit application and reflected in this permit and which result in increased emissions.

Notification of Name Change

- G21. The permittee shall notify LRAPA in writing, using an LRAPA Application for Administrative Amendment to ACDP form, within 60 days after legal change of the registered name of the company with the Corporation Division of the State of Oregon.

Applicable administrative fees must be submitted with an application for the name change.

Permit Renewal

- G22. Application for renewal of this permit must be submitted not less than 60 days prior to the permit expiration date. A Filing Fee, an Application Processing Fee, and an Annual Compliance Determination Fee must be submitted with the application for the permit renewal. [LRAPA 34-035]
- G23. The procedure for issuance of a permit shall apply to renewal of a permit. If a completed application for a renewal of a permit is filed with LRAPA in a timely manner, prior to the expiration date of the permit, the permit shall not be deemed to expire until final action has been taken on the renewal application to issue or deny a permit. [LRAPA 34-130(16)]

Termination Conditions

- G24. This permit shall be automatically terminated: [LRAPA 34-140(2)]
- a. within sixty (60) days after sale or exchange of the activity or facility which requires a permit;
 - b. upon change of nature of the activities, operations, emissions, or discharges from those of record in the last application;
 - c. within one (1) year after a plant closure lasting continuously for one (1) or more years;
 - d. upon issuance of a new, renewal, or modified permit for the same operation; or
 - e. upon written request of the permittee.
- G25. In the event that it becomes necessary to suspend or terminate this permit due to non-compliance with the terms of the permit, unapproved changes in operation, false information submitted in the application or any other cause, LRAPA shall notify the permittee by registered or certified mail of its intent to suspend or revoke the permit. Such notification shall include the reasons for the suspension or revocation. The suspension or revocation shall become effective twenty (20) days from the date of mailing of such notices unless, within that time, the permittee requests a hearing. Such a request for hearing shall be made in writing and shall state the grounds for such a request. [LRAPA 34-140(3)]
- G26. Termination of this permit resulting from continuous plant closure shall subject the source to review as a new non-permitted source upon application to operate the facility. [LRAPA 34-140(4)]
- G27. If LRAPA finds that there is a serious danger to the public health or safety or that irreparable damage to a resource will occur, it may suspend or terminate this permit, effective immediately. Notice of such suspension or termination must state the reasons for such action and advise that

the permittee may request a hearing. Such a request for a hearing shall be made in writing within ninety (90) days of the date of the suspension and shall state the grounds for the request.
[LRAPA 34-140 (5)]

G28. Any hearing requested shall be conducted pursuant to the rules of LRAPA. [LRAPA 34-140(6)]

G29. The permittee may be required to submit, by April 20 of each year, the emission inventory form provided by LRAPA.

DW/bp [revised 10/24/01, 4/18/06, 10/10/07]